

**Before the  
FEDERAL COMMUNICATIONS COMMISSION  
Washington, D.C. 20554**

<b>In the Matter of</b>	)	
	)	
<b>Amendment of Section 97.201(b) of the</b>	)	<b>RM - 10313</b>
<b>Commission's Rules Regarding Auxiliary</b>	)	
<b>Operation in the Amateur Service</b>	)	

**To: Chief, Public Safety and Wireless Division,  
Wireless Telecommunications Bureau**

**COMMENTS OF KENWOOD COMMUNICATIONS CORPORATION**

Kenwood Communications Corporation ("Kenwood"), the petitioner, appreciates the Commission's placement of its Petition on *Public Notice*, Report No. 2507, released October 19, 2001. The Notice asks for comment from the public on Kenwood's Petition for Rulemaking to amend Section 97.201(b) of the Commission's Rules to allow auxiliary amateur radio station operation on amateur frequencies above 144.5 MHz, except for 145.8-146.0 MHz, 219-220 MHz, 222.0-222.150 MHz, 431-433 MHz and 435-438 MHz.

Kenwood continues to strongly support its Petition for Rulemaking and requests that the Commission act favorably on it, by issuing a Notice of Proposed Rulemaking without delay. Kenwood continues to believe that its Petition for Rulemaking would increase the flexibility and utility afforded amateur radio licensees in the use of their allocations, and it would not have harmful effects on other amateur radio uses of the 2-meter amateur band.

Kenwood will address the comments filed by others in reply comments. However, one issue should be considered now: crowding of the 2-meter amateur band is not a basis for artificial regulatory limits imposed by the FCC which restrict the rollout of new amateur radio technology.

Kenwood is confident that amateur radio operators can, do, and will continue to use their shared bands cooperatively, and informally, without the need for intervention from the FCC. Many amateur bands are crowded. That is not a good reason to restrict new technology. The restrictions on auxiliary operation in the amateur radio service are no longer justified, and should be deregulated just as the repeater rules have been deregulated over the years. Crowding in amateur bands in this case should be balanced against the ability of amateur radio operators to deal with the restrictions on high-frequency operation resulting from antenna restrictions. Expanding the ability of amateurs to use auxiliary links to remotely control high-frequency stations (among other applications) provides a solution for amateur radio operators who otherwise would not be able to operate a high frequency station due to antenna restrictions. Adding new uses to crowded amateur bands is one of the realities of amateur radio, as well as other radio services.

Therefore, Kenwood continues to support this petition, and urges that the Commission release a Notice of Proposed Rulemaking right away proposing the rule changes in the Kenwood petition.

Respectfully submitted,

Thomas C. Wineland

President

Kenwood Communications Corporation

3975 Johns Creek Ct., Suite 300

Suwanee, GA 30024

(678) 474-4700

November 19, 2001